

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JUN 16 2021

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

SC Court of Appeals

Michael G. Nettles, Circuit Court Judge

Case No. 2018-CP-22-00824
Appellate Case No. 2021-000325

Evarista Juan Lorenzo, Appellant,

v.

Port City Elevator, Inc.; Alan Topper d/b/a All Construction;
2020 Custom Contractors a/k/a 2020 Custom Contractors, LLC;
Citadel Site Management, LLC; DVBT Construction a/k/a DVBT
Construction, LLC; DVBT Multiservices, LLC; Beverly Construction Group, LLC; Beverly
Homes, LLC; Beverly Homebuilders, LLC; Strand Paint Contractors, LLC; Depaz Painting,
LLC; Enhanced Heating & Air Conditioning, LLC; Carlton Pender, and Joan Pender,
Defendants,

Of Which,

Port City Elevator, Inc.; Alan Topper d/b/a All Construction;
2020 Custom Contractors a/k/a 2020 Custom Contractors, LLC;
Citadel Site Management, LLC; DVBT Construction a/k/a DVBT
Construction, LLC; DVBT Multiservices, LLC; Beverly Construction Group, LLC; Beverly
Homes, LLC; Beverly Homebuilders, LLC; Strand Paint Contractors, LLC; Depaz Painting,
LLC and Enhanced Heating & Air Conditioning, LLC are the Respondents.

**MOTION FOR EXTENSION OF TIME FOR APPELLANT TO SERVE AND FILE
INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE
RECORD ON APPEAL**

Pursuant to Rule 240, SCACR, appellant Evarista Juan Lorenzo ("Lorenzo") moves for
an extension of time in which to serve and file Appellant's Initial Brief and Designation of

Matter to be included in the Record on Appeal ("Designation of Matter"). Lorenzo is seeking an extension of thirty (30) days to file the Initial Brief and Designation of Matter which is due June 25, 2021. This is the first request for an extension filed by Lorenzo.

On May 5, 2021, Lorenzo received the transcript for the hearing that took place on February 23, 2021. The transcript of the December 4, 2020 hearing in this matter was received by Lorenzo on May 26, 2021. Lorenzo is informed and believes that her deadline to file her Initial Brief and Designation of Matter on Appeal would be June 25, 2021. Lorenzo is seeking an additional thirty (30) days to file her Initial Brief and Designation of Matter on Appeal for this case.

Lorenzo would show that a thirty (30) day delay will not prejudice the rights of any of the parties. Lorenzo would further show that counsel for all parties to this case have been notified of her intent to file this motion and no party has objected. Granting this motion would require the Initial Brief and Designation of Matter to be filed with the Court no later than Monday, July 26, 2021.

For these reasons, Lorenzo requests an extension of the deadline for filing and serving the Initial Brief and Designation of Matter until July 26, 2021.

Dated this the 15th day of June 2021.

Signature Page Follows

P. Brooke Eaves Wright

Ian D. Maguire, Esquire

SC Bar No.: 66587

P. Brooke Eaves Wright, Esquire

SC Bar No.: 102021

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Attorneys for Appellant

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LLC and Enhanced Heating & Air Conditioning, LLC are the Respondents.

PROOF OF SERVICE

I, the undersigned, of the Maguire Law Firm, attorneys for Appellant, hereby certify that I
have served the foregoing documents this the 15th day of June 2021 via electronic service to the
following individual at the following address:

DOCUMENTS SERVED:

- **Motion for Extension of Time for Appellant to Serve and File Initial Brief and Designation of Matter to be included in the Record on Appeal**

INDIVIDUALS SERVED:

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SERVED BY:



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*Ian D. Maguire**
Brooke E. Wright
Brittney F. Jones
Tiffany Buffkin

**Licensed in North & South Carolina*

BARBARA J. BELCHER
Litigation Paralegal
barb@maguirelawfirm.com

June 15, 2021

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

RE: Evarista Juan Lorenzo v. Port City Elevator, Inc.; et al
Appellate Case No.: 2021-000325
ML File No.: 1004384

Dear Ms. Kitchings:

Please find enclosed herein the original and seven (7) copies of the Motion for Extension of Time for Appellant to Serve and File Initial Brief and Designation of Matter to be included in the Record on Appeal. Also enclosed, please find a firm check in the amount of \$50.00 for the applicable filing fee for this Motion. Please file stamp the extra copy and return the same to our office in the enclosed self-addressed stamped envelope.

By copy of this correspondence I am notifying all counsel of record of this communication with the Court.

With kind regards, I am,
Sincerely,

Barbara J. Belcher
Paralegal for Ian D. Maguire, Esquire
BJB/bb
Enclosures

cc: Evarista J. Lorenzo
David Starr Cobb, Esquire
William Wharton Watkins Jr., Esquire
Joseph John Dodds IV, Esquire
Morgan S. Templeton, Esquire
Lee Cannon Weatherly, Esquire
Katherine Ann Walker, Esquire
Robert Michael Ethridge, Esquire
Joshua Daniel Shaw, Esquire
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LTR 1 OF 1

SHIP TO:
HONORABLE JENNY ABBOTT KITCHINGS
SC COURT OF APPEALS
1220 SENATE STREET
COLUMBIA SC 29201

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